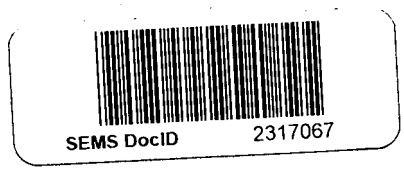

Stoney Creek Technologies
3300 4th Street
Trainer, Pennsylvania 19061

Delaware County

Site Visit: May 11, 2010
Site Assessment/Removal Response Program

- Currently owned by Chemtura (bankrupt), formerly Witco Chemical; located in a mixed industrial/residential neighborhood
- Previously chemical manufacturing facility, primarily corrosion inhibitors, fuel additives, and oil additives, with approximately 200 tanks, laboratory, wastewater treatment plant (WWTP), several buildings, and many other processing related equipment, i.e., vessels, piping, etc.
- Removal Response Program notified in April, 2007, that the facility was in bankruptcy and chemical substances remained at the site posing flammable and combustible threats
- Wastes remaining at the site include Oleum (acid fuming), sulfuric acid heels (waste in bottom of tanks), methanol (vapor hazard), sulfonates, mixtures (unknown), and raw products (hazardous); Records also indicate waste near the adjacent active railroad tracks from spills and flammable oils remain (lubricating oils and mineral spirits)
- Previously during large rain events, oil would seep up through the sidewalks (seems to be alleviated for now); Indication that there is an underground water problem and oil remains on top of the layer of stone
- Most of the oil is being captured via the WWTP through an oil-water separator; however, there may be some discharge into Stoney Creek from a nearby recycling facility (junk yard); All storm water from rain events travels to the WWTP
- PADEP was involved with the site by providing the funds to maintain the electricity at the site; Costs are approximately $800,000 per year to maintain the basics at the site [WWTP/Oil-Water separator: electricity and security]
- PADEP would prefer for the Removal Response Program to finish the clean up activities at the site; however, the cost would be approximately $6 million over a 2 year period
- Alternatives to resolving the remaining wastes on site include:
    - Obtaining a new operator [the operator would have available funds – approximately $20 million to clean up and maintain the site]
    - Continue with Removal Response Program activities [Removal Response Program provides clean up of the tracks (3 areas), all residual areas including trenches, drains, and the former WWTP over the next 2.5 years for a cost of approximately $5.9 million], or
    - Placing the site on the NPL [with the possibility of Removal Response Program activities continuing for minimal site maintenance for a cost of approximately $3 million over 3 years awaiting the remedial response]

Specific Site Issues (as of the May 11, 2010 site visit)

- Oil leaks discovered near tanks 551, 955, and 204 (near the former WWTP where there was a lagoon)
- Oil seeping near tank 440 near the sulfonic acid area; tanks 129 and 128 are flammable
- Approximately a total of 200,000 gallons of residuals remain at the entire facility
- Tanks T-105 and T-106 contain approximately 6,500 gallons of Oleum; Because of the properties of Oleum, it is better to dispose of it in warmer weather
- Most tanks have approximately ¼ to 1/3 of residuals left in the bottom
- Flammable residuals were removed from 70 tanks; Tanks were also used for combustible materials
- Most of the oil during rain events is being trapped in the holding tanks at the WWTP as long as the WWTP is operating; therefore, it is imperative that the WWTP continues operations
- The effluent from the WWTP is discharged to Stoney Creek; The NPDES permit limits regulates the discharge and the effluent analysis usually meets the limits through settling
- During very high volume rain events, the liquids are directly discharged to Stoney Creek
- Staining shown on concrete/asphalt from a nearby recycler/junk yard appears to lead directly to Stoney Creek
- The acid operations are divided at the plant in two sides; One side manufactures the sulfonates which have a 'peanut butter' consistency when warm; the other side makes SACI (Severe Atmospheric Corrosive Inhibitors)
- Some of the drains are abandoned and contain a 'goo- like' substance ; Appears that the oil does not move through the old piping and gets caught within the drains
- Previously a large spill occurred near the railroad tracks; Three areas specified as 'rail loading spots' were designated for clean up due to the spill; The 'rail loading spots' are directly tied into the WWTP; A vast amount of oil still remains under the gravel near the railroad tracks
- Best efficient method to address the tanks and piping is disposal since most of the piping and tanks contain sticky, gooey, oil residuals; An enormous amount of funds would be used to clean the piping and tanks and place the equipment back into operation
- There are potentially underground storage tanks
- Tanks containing alkalytes have been addressed
- Within the centrifuge area, a hardened material remains which needs disposal; Previously, fly ash was transported to the site for mixing with the oil in anticipation for use as asphalt; The mixture hardened when it contacted liquid, i.e., rain, with the residual entering the sewer lines which are currently filled with ash and a gooey substance
- To place the site on the NPL, the following tasks should occur:

    - Conduct PA/SI activities since there is no sampling data

- Concentrate on railroad track and former WWTP areas and possibly abandoned drains and piping to determine CERCLA regulated wastes and source areas; Since the main constituent at the site is "oil", CERCLA regulations may not apply
- Coordinate with PADEP – PADEP prefers for the Removal Response Program to complete clean up activities since there is not enough funding in the State's budget